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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2022-001208
Case No. 2018-CP-10-03286

Karolina Richardson and Krista Richardson,

Respondents,

v.

Mt. Pleasant Square Associates, II, LLC d/b/a Oyster Park Apartments, Dewberry Capital Corporation, and GREP Southeast, LLC,

Appellants.

**DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD OF APPEAL OF RESPONDENTS
KAROLINA RICHARDSON AND KRISTA RICHARDSON**

Respondents Karolina Richardson and Krista Richardson propose the following matter be included in the Record on Appeal:

Orders:

1. Form 4 Judgment in a Civil Case, dated August 11, 2022
2. Order Denying Defendants' Motion for Judgment Notwithstanding Verdict, dated August 24, 2022
3. Order Granting Plaintiff's Motion for Sanctions Pursuant to Rule 37(b)(2)(C), SCRPC, dated December 8, 2022

4. Order Denying Defendants' Motion to Alter or Amend Order and/or Motion to Reconsider, dated June 6, 2023

Pleadings:

1. Summons and Complaint, dated June 27, 2018
2. Defendants' Motion to Amend Answer and Assert Third-Party Claims, dated June 21, 2019
3. Plaintiffs' Motion for Sanctions Pursuant to SCRPC 37(b)(2)(C), dated July 15, 2022
4. Plaintiffs' Email to The Honorable Jennifer McCoy Supplementing Motion for Sanctions Pursuant to SCRPC 37(b)(2)(C) with Exhibits, dated July 17, 2022:
 - a. Exhibit 1: Letter to Jamie Ackerman, dated January 25, 2019
 - b. Exhibit 2: Letter to Jamie Ackerman, dated February 19, 2019
 - c. Exhibit 3: Motion to Compel, dated March 4, 2019
 - d. Exhibit 4: Letter to Douglas Leadbitter, dated December 19, 2019
 - e. Exhibit 5: Letter to Douglas Leadbitter, dated July 7, 2020
 - f. Exhibit 6: Email from Gower, Wooten & Darneille, dated July 10, 2020
 - g. Exhibit 7: Motion to Compel, dated July 30, 2020
 - h. Exhibit 8: Letter to Doug Leadbitter, dated September 24, 2020
 - i. Exhibit 9: Form 4 Order Granting Plaintiffs' Motion to Compel, dated January 10, 2021
 - j. Exhibit 10: Email from Kirkley White, dated December 10, 2021
 - k. Exhibit 11: Email from Emily Sheets, dated June 24, 2022
 - l. Exhibit 12: Defendants' Supplemental Document Production, dated July 15, 2022
5. Affidavit of Clayton B. McCullough, Esq., dated July 21, 2022

Transcripts:

1. Transcript of Record, July 18, 2022, Volume 1 of 5
Pp. 25, 26, 27
2. Transcript of Record, July 19, 2022, Volume 2 of 5
Pp. 91, 102, 103, 105, 106, 107, 108, 109, 110, 111, 114
3. Transcript of Record, July 20, 2022, Volume 3 of 5
Pp. 227, 229, 233, 234, 237, 239, 242, 243, 262, 263, 303, 304, 306, 307, 309,
310, 311, 313, 315, 316, 317, 318, 333
4. Transcript of Record, July 22, 2022, Volume 5 of 5
Pp. 702, 703, 709, 710

Trial Exhibits:

1. Plaintiffs' Exhibit #2
2. Plaintiffs' Exhibit #3
3. Plaintiffs' Exhibit #4
4. Plaintiffs' Exhibit #5
5. Plaintiffs' Exhibit #6
6. Plaintiffs' Exhibit #7
7. Plaintiffs' Exhibit #8
8. Plaintiffs' Exhibit #9
9. Plaintiffs' Exhibit #10
10. Plaintiffs' Exhibit #11
11. Plaintiffs' Exhibit #12
12. Plaintiffs' Exhibit #13
13. Plaintiffs' Exhibit #14
14. Plaintiffs' Exhibit #15
15. Plaintiffs' Exhibit #16

16. Plaintiffs' Exhibit #17
17. Plaintiffs' Exhibit #20
18. Plaintiffs' Exhibit #23
19. Plaintiffs' Exhibit #24
20. Plaintiffs' Exhibit #25
21. Plaintiffs' Exhibit #26
22. Plaintiffs' Exhibit #31
23. Plaintiffs' Exhibit #32
24. Plaintiffs' Exhibit #33
25. Plaintiffs' Exhibit #38
26. Plaintiffs' Exhibit #53
27. Defendants' Exhibit #7

Other Materials:

1. Debra Baumgartner Deposition Excerpts

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

s/Clayton B. McCullough
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September 15, 2023